

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

June 9, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Steven I. Locke, U.S.M.J.
100 Federal Plaza
Courtroom 820
Central Islip, NY 11722

Re: Rivas v. Ariel Auto Collision Corp., et ano.
Case No.: 2:23-cv-5371 (NJC) (SIL)

Dear Judge Locke:

This firm represents the Defendants in the above-referenced case, who respectfully submit this letter motion to request an adjournment of the in-person hearing scheduled to proceed on Wednesday, June 11, 2025 at 10:15 AM.

Consistent with the Individual Motion Practices, Defendants respectfully submit that: (i) the date of the original conference is above; (ii) the reason an adjournment is needed is because I am required to appear for an Order to show cause by the Hon. Jerome C. Murphy, J.S.C. in Nassau County Supreme Court at 10:00 AM that day; (iii) there has been at least one (1) previous request for an adjournment; (iv) this request was granted; (v) the adversary consents to the request for an adjournment; and (vi) the parties are available in the afternoon on June 9, 2025 and any other date in the event this Court is unavailable then.

Defendants respectfully submit that based on the foregoing, there exists sufficient good cause for this Court to exercise its discretion in favor of granting the requested adjournment. See Fed. R. Civ. P. 6(b)(1)(A). Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
June 9, 2025

Respectfully submitted,
SAGE LEGAL LLC
By: /s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

*Attorneys for Defendants
Ariel Auto Collision Corp.
and Rodshel Khaimov*

VIA ECF

Colin Mulholland, Esq.
3636 33rd Street, Suite 308
Astoria, NY 11106
cmulhollandesq@gmail.com

Attorneys for Plaintiff
Juan Martinez Rivas